

# ADEQ

ARKANSAS  
Department of Environmental Quality

December 12, 2011

Dan Dawson  
City of Searcy  
Searcy Board of Utilities  
PO Box 1319  
Searcy, AR 72145

AFIN: 73-00055

NPDES Permit No.: AR0021601

Dear Mr. Dawson:

On December 8, 2011, Risa Parker and I performed a Pretreatment Compliance Inspection of the waste water treatment facility as well as two inspections of your Industrial Users in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. These inspections revealed you are within the terms of your permit and no violations were noted.

If I can be any assistance, please contact me at [zweifel@adeq.state.ar.us](mailto:zweifel@adeq.state.ar.us) or 501-682-0657.

Sincerely,



Lindsay Zweifel  
District 9 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



Form Approved  
OMB No. 2040-0003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

# NPDES Compliance Inspection Report

## Section A: National Data System Coding

Transaction Code			NPDES									Yr/Mo/Day					Inspec. Type		Inspector		Fac. Type															
1	N	2	5	3	A	R	0	0	2	1	6	0	1	11	12	1	1	1	2	0	8	17	18	P	19	S	20	1								
Remarks																																				
0											W											H						I	T	E	C	O	U	N	T	Y
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved																				
67						69		70		N		71		N		72		N		73				74		75				80						

## Section B: Facility Data

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) <b>City of Searcy</b> <b>260 north Bypass Road.</b> <b>Searcy AR White Co.</b>	Entry Time/Date <b>9:15 am 12/8/11</b>	Permit Effective Date <b>2/1/2008</b>
	Exit Time/Date <b>3:30 pm 12/8/11</b>	Permit Expiration Date <b>1/31/2013</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Dan Dawson, general manager 501-268-2481 Jimmy Smith, pretreatment coordinator</b>	Other Facility Data  <b>35.267878</b> <b>-91.720967</b>  <b>PDS 062770</b>	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Dan Dawson/(501) 268-2481</b> <b>City of Searcy</b> <b>Searcy Board of Utilities</b> <b>PO Box 1319</b> <b>Searcy, AR 72145</b>	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	


## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
S	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	S	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water		Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

**File reviews on 3 IUs as well as the pretreatment program were performed. Two IU site visits were performed as well. Pretreatment program appears in good shape.**

Name(s) and Signature(s) of Inspector(s) <b>Lindsay Zweifel / </b>	Agency/Office/Telephone/Fax <b>ADEQ/ North Little Rock/ 501-682-0657/ 501 682-0910</b> <b>(Fax)</b>	Date <b>12/8/11</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT**

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Name of Municipality: City of Searcy

AFIN Number: 73-00055

NPDES Permit Number(s): AR0021601

Program Tracked under NPDES Permit Number: AR0021601

Fact Sheet Preparation Date: \_\_\_\_\_

Date of Last PCI/Audit: PCI-5/13/09 Audit-August of 2010

Date of Last Annual Report: March 2011

Name of Inspector: Lindsay Zweifel

Date PCI Performed: December 8, 2011

Name, Title, and Telephone Number of Facility Representative:  
Jimmy Smith- Pretreatment Coordinator

Name and Title of Other Participants: \_\_\_\_\_

Number of IUs Visited: 2

Name(s) of IUs Visited: Road Systems and Land O' Frost

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AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

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**NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.**

Form approved July 1989



B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? yes

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2. Describe any apparent problems with the local limits.  
none

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3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>1/qtr</u>	<u>1/qtr</u>	<u>1/qtr</u>	<u></u>
Effluent:	<u>1/qtr</u>	<u>1/qtr</u>	<u>1/qtr</u>	<u></u>
Sludge:	<u>1/qtr</u>	<u></u>	<u></u>	<u></u>
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>1/year</u>	<u></u>
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>1/year</u>	<u></u>
Sludge:	<u>1/year</u>	<u></u>	<u></u>	<u></u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?  
No, the plant is running well.

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C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? yes
2. How many IU permits (or other control documents) have been issued? 11
3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**  
**Yes**
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4. Does the control document contain the following items?
- An expiration date: Yes
- Discharge limitations: Yes
- If the program requires self-monitoring by the IUs, do the Permits contain:
- IU self-monitoring requirements: Yes
- IU reporting requirements: Yes
5. Indicate which of the following recommended standard conditions are contained in the control documents:
- Sample location: Yes
- Type of sample: Yes
- Monitoring frequency: Yes
- Bypass prohibition: Yes
- Right of entry: Yes
- Nontransferability: Yes
- Revocation clause: Yes
- Penalty Provisions: Yes
- Slug load notification: Yes
- Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>2/year</u>	<u>2/year</u>
other SIUs	<u>2/year</u>	<u>2/year</u>
Inspection:		
categorical IUs	<u>1/year</u>	<u>1/year</u>
other SIUs	<u>1/year</u>	<u>1/year</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes

3. Are inspections announced or unannounced? Announced

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: Yes

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: The inspection Documentation is adequate.

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).

Yes

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes

9. Are sampling and flow monitoring equipment properly maintained? Yes

10. Is the POTW keeping proper field notes and chain of custody forms? Yes

11. Is the sampling location representative of the discharge to the collection system? Yes

12. Are sampling locations identified in POTW records? Yes

13. Are sampling services available in an emergency? Yes

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? When received the documents are stamped, dated, and signed.

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes



17. What are the POTW's procedures for following up violations?  
Notice of violation is sent and enforcement occurs depending  
on type of violation. Follow up then occurs.

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18. **HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR**  
**403.12(b)?: No BMR reviewed because no new CIU**

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Review a Baseline Monitoring Report from the POTW's file,  
and indicate which of the following items can be identified  
in the BMR:

Name and address: \_\_\_\_\_

Other environmental permits held: \_\_\_\_\_

Description of operations: \_\_\_\_\_

Process flow diagrams: \_\_\_\_\_

Flow measurements: \_\_\_\_\_

Measurements of regulated pollutants: \_\_\_\_\_

Certification of compliance by the IU: \_\_\_\_\_

Compliance schedule (if needed): \_\_\_\_\_

19. Additional comments on the POTW's inspection and sampling  
procedures: The 2/year sampling by the POTW has been  
slightly spaced out. All the industries are sampled and then  
they are sampled again. 2 years ago sampling was being  
performed on 2 consecutive days.

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5. Comments on the POTW's enforcement procedures:

**Enforcement procedures appear to be adequate.**

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F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes**

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2. Are staffing levels adequate? **Yes**

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3. Are the responsible officials familiar with the approved program? **Yes**

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G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:  
**None outside jurisdiction.**

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2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **n/a**

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3. Does the POTW have copies of permits for IUs in other cities? **n/a**

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4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? **n/a**

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5. Comments on multijurisdictional issues: \_\_\_\_\_

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PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Land O' Frost

POTW Name: City of Searcy

Industry Contacts: Travis Ellis

Date and Time of Visit: 12/8/11 1:15 pm

Description of Manufacturing Process:  
Processing, cooking, slicing, and packing of luncheon meats.

Sources of Process Wastewater:  
Cleaning of equipment

Categorical Industry? No

Basis for Limits: City based

Point of Application: manhole

Description of Pretreatment Equipment and Procedures:  
Floor drains have catch basins. Sludge and grease pumped from settling basins and acidification for pH neutralization.

Spill Prevention and Solvent Management Procedures:  
Chemicals contained in one area and all located within secondary containment. No solvents are used.

Sampling Location and Equipment:  
Manhole just outside the pretreatment room. Sampler brought in for sampling.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Road Systems

POTW Name: City of Searcy

Industry Contacts: Randy Simmons

Date and Time of Visit: 12/8/11 2:30 pm

Description of Manufacturing Process:  
Several production lines manufacture and refurbish tractor trailers.

Sources of Process Wastewater:  
3 wash bays located along manufacturing lines.

Categorical Industry? no

Basis for Limits: City based

Point of Application: manhole

Description of Pretreatment Equipment and Procedures:  
Wash water flows into floor drains which is pumped into waste holding containers. It's treated with acid to adjust the pH before being discharged to the POTW.

Spill Prevention and Solvent Management Procedures:  
Not evaluated.

Sampling Location and Equipment:  
Manhole outside the facility. Sampler brought in.

## PPETS CODE SHEET

## PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Lindsay Zweifel</u>	
NAME OF FACILITY:	<u>City of Searcy</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021601</u>	NPID
DATE OF PCI:	<u>12/8/2011</u>	DTIA

## PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>11</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>1</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN